

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In Re: Vera M. Green,

Debtors.

Chapter 13

Case No. 16-24985-BEH

MOTION TO IMPOSE THE AUTOMATIC STAY

NOW COMES the above-named Debtor, Vera M. Green, by and through her attorney, Strouse Law Offices, LLC, by Atty. Paul A. Strouse, and hereby moves this Court, pursuant to 11 USC § 362 (c)(4) *et seq.*, for a Motion to Impose the Automatic Stay as to all creditors in the above-captioned matter. In support of this Motion, Debtor alleges as follows:

1. The Debtor filed a voluntary petition under Chapter 13 of Title 11 of the U.S. Code on May 16, 2016, Case No. 16-24985-BEH.
2. The Debtor had two previous bankruptcies that were dismissed within the last year, Case Nos. 14-28970 and 16-21975. The dismissal of Case No. 14-28970 on January 20, 2016, was caused by Debtor's failure to make plan payments. The last dismissal, Case No. 16-21975 on March 21, 2016, was a voluntarily dismissed as the Debtor wanted to attempt to pay off her debts without the assistance of bankruptcy court.
3. Pursuant to 11 USC § 362 (c)(4)(B) "if, within 30 days after the filing of the later case, a party in interest requests the court may order the stay to take effect in the case as to any or all creditors (subject to such conditions or limitations as the court may impose), after notice and a hearing, only if the party in interest demonstrates that the filing of the later case is in good faith as to the creditors to be stayed[.]"

Drafted by:
Atty. Paul A. Strouse
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413 N. 2nd Street – Suite 150
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Email: StrouseLawOffices@gmail.com

4. Good faith filing is established in this case as the Debtor has experienced a significant change in circumstances. Since her last case (16-21975) was dismissed, the Debtor has gained additional employment, the income from which will ensure that the Debtor will be able to make her plan payments in full and on time (see attached *Affidavit of Changed Circumstances*).

WHEREFORE, Debtor requests that the Court grant the following relief:

1. An order imposing the automatic stay as to all creditors;
2. Any other relief the Court deems is just and proper.

Dated at Milwaukee, Wisconsin this 16th day of May, 2016.

/s/Paul Strouse

Strouse Law Offices

Attorneys for Debtor

By: Paul Strouse

State Bar No. 1017891

Drafted by:

Atty. Paul A. Strouse

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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In Re: Vera Green,

Chapter 13

Debtor.

Case No. 16-24985-BEH

AFFIDAVIT OF CHANGED CIRCUMSTANCES

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

I, Vera Green, upon first being duly sworn upon oath under penalty of perjury, do hereby affirm that the following is true and accurate to the best of my knowledge:

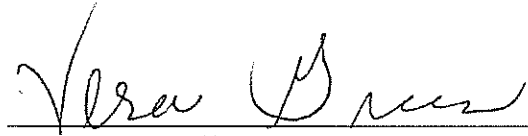
1. I am an adult that currently resides at 6603 N. 58th Street, Milwaukee, Wisconsin 53233.
2. I filed a voluntary petition Chapter 13 of Title 11 of the U.S. Code on May 13, 2016, Case No. 16-
3. I filed two previous bankruptcies that were dismissed within the last year - Case No. 14-28970 which was filed in the United States Bankruptcy Court for the Eastern District of Wisconsin on July 15, 2014, which was dismissed on January 20, 2016, for my failure to make plan payments, and Case No. 16-21975 which was filed in the United States Bankruptcy Court for the Eastern District of Wisconsin on March 9, 2016, and voluntarily dismissed on March 21, 2016. My last case (16-21975) was voluntarily dismissed as I was hopeful that I would be able to pay off my debts on my own without the assistance of the bankruptcy court.
4. I am confident that I will be able to make my future plan payments on time and in full as my circumstances have changed. Prior to my case being dismissed in March 2016, my only sources of income were from my social security income and adoption assistance. However, in March 2016, I obtained new part-time employment with Uber earning approximately \$200-\$300 per week, and this is income which I did not have before my last case was dismissed.

Drafted by:

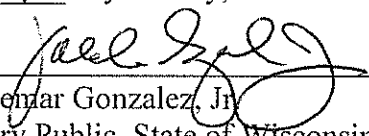
Atty. Paul A. Strouse
Strouse Law Offices
413 N. 2nd Street, Suite 150
Milwaukee, WI 53203
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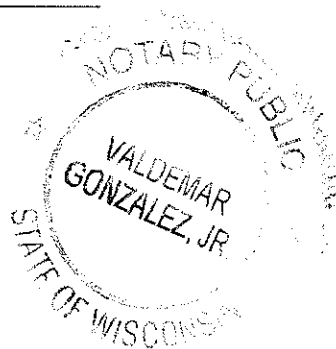
5. I am confident that my current bankruptcy will conclude with a successful reorganization of my financial affairs. Now that I have realized a significant increase in income from my employment with Uber, I am confident that I will be able to make my future plan payments on time and in full.
6. I assert that my Chapter 13 plan will be filed in good faith. I further assert that my Chapter 13 plan will be confirmable and in accordance with all applicable law. Finally, I assert that I am able to fully perform pursuant to the terms of the Chapter 13 plan submitted in the above-captioned case.
7. I assert that the information in this affidavit is true and accurate to the best of my knowledge, and this Affidavit is given in support of my Motion to Impose the Automatic Stay.

Dated at Milwaukee, Wisconsin this 16th day of May, 2016.


Vera Green, Affiant

Subscribed and sworn to before me
this 16th day of May, 2016.


Valdemar Gonzalez, Jr.
Notary Public, State of Wisconsin
My commission expires 1/13/2020.



UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In Re: Vera M. Green,

Debtors.

Chapter 13

Case No. 16-24985-BEH

NOTICE OF MOTION TO IMPOSE THE AUTOMATIC STAY

Vera M. Green has filed documents with the court requesting an order imposing the automatic stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to impose the automatic stay, then you must attend the hearing scheduled on **June 14, 2016 at 9:00 AM** in Room 149 of the U.S. Courthouse, 517 E. Wisconsin Avenue, Milwaukee, Wisconsin 53202, or if you want the Court to consider your views on the Motion to Impose Stay, then on or before the date mentioned above, you or your attorney must file with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

U.S. Bankruptcy Clerk
U.S. Courthouse, Room 167
517 E. Wisconsin Avenue
Milwaukee, WI 53202

If you mail your request to the court for filing, you must mail it early enough so that the court will receive it before the date stated above.

Drafted by:
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Strouse Law Offices
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You must also mail a copy to:

Att. Paul A. Strouse
Strouse Law Offices, LLC
413 N. 2nd Street, Suite 150
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

If you or your attorney do not take these steps, the court may decide that you do not oppose the motion or the relief sought therein and may enter an order imposing the automatic stay.

Dated at Milwaukee, Wisconsin this 16th day of May, 2016.

/s/Paul Strouse
Strouse Law Offices
Attorneys for Debtor
By: Paul Strouse
State Bar No. 1017891

Drafted by:
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Label Matrix for local noticing
0757-2
Case 16-24985-beh
Eastern District of Wisconsin
Milwaukee
Mon May 16 16:47:39 CDT 2016

Aargon Agency
8668 Spring Mountain Road
Las Vegas, NV 89117-4132

Attorney Michael S. Winter
735 West Wisconsin Avenue, #980
Milwaukee, WI 53233-2413

Check 'n Go
4847 North 76th Street
Milwaukee, WI 53218-3826

ERC/Enhanced Recovery Corp
8014 Bayberry Road
Jacksonville, FL 32256-7412

Financial Control Services
N114 W 19225 Clinton Drive
Germantown, WI 53022-3015

Great Lakes Specialty Finance Inc
dba Check 'N Go
4847 N. 76th St.
Milwaukee, WI 53218-3826

Medical College of Wisconsin
PO Box 13308
Milwaukee, WI 53213-0308

Midnight Velvet
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374-0933

AT&T
Attn: Bankruptcy Department
1585 Waukegan Road
Waukegan, IL 60085-6727

Afni Insurance Services
404 Brock Drive
Bloomington, IL 61701-2654

Aurora Health Care
P.O. Box 091700
Milwaukee, WI 53209-8700

(p)CITY OF MILWAUKEE TREASURER S OFFICE
200 EAST WELLS STREET
ROOM 103
MILWAUKEE WI 53202-3599

Falls Collection Services
PO Box 668
Germantown, WI 53022-0668

Froedtert Health
400 Woodland Prime, Suite #103
N74 W12501 Leatherwood Count
Menomonee Falls, WI 53051-4490

Hampton Dental Associates SC
5323 W. Hampton Avenue
Milwaukee, WI 53218-5019

Merchants Credit Guide
223 West Jackson Boulevard, Suite #
Chicago, IL 60606-6914

Monroe & Main
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374-0933

Procure Medical Group
3727 West Wisconsin Avenue
Milwaukee, WI 53208-3182

AT&T Mobility II, LLC
AT&T Services Inc.
Karen A. Cavagnaro - Paralegal
One AT&T Way, Suite 3A104
Bedminster, NJ 07921-2693

(p)AMERICOLLECT INC
PO BOX 2080
MANITOWOC WI 54221-2080

Axcess Financial
7755 Montgomery Road
Suite 400
Cincinnati, OH 45236-4197

Community Memorial Hospital
P.O. Box 3106
Milwaukee, WI 53201-3106

Federated Adjustment Co. Inc
P.O. Box 170680
7929 N. Port Washington Rd
Milwaukee, WI 53217-3135

Ginny's
c/o Creditors Bankruptcy Service
P.O. Box 74093
Dallas, TX 75374

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Midnight Velvet
1112 7th Avenue
Monroe, WI 53566-1364

Monroe and Main
1112 7th Avenue
Monroe, WI 53566-1364

Professional Placement Services
316 North Milwaukee, Suite #410
Milwaukee, WI 53202-5888

Seventh Avenue
1112 7th Ave
Monroe, WI 53566-1364

Seventh Avenue
c/o Creditors Bankruptcy Service
P.O. Box 740933
Dallas, TX 75374-0933

Time Warner Cable
1320 N. Martin Luther King Dr.
Milwaukee, WI 53212-4002

Van Ru Credit Corporation
1350 East Touhy Avenue
Suite #300e
Des Plaines, IL 60018-3342

WE Energies
231 West Michigan Street
Milwaukee, WI 53203-2918

WE Energies
Attn: Bankruptcy Department
333 West Everett Street, Room A130
Milwaukee, WI 53203

WE Energies
Attn: Bankruptcy Department
PO Box 2046
Milwaukee, WI 53201-2046

Wells Fargo Bank, NA
P.O. Box 19657
Irvine, CA 92623-9657

Wells Fargo Dealer Services
P.O. Box 3569
Rancho Cucamonga, CA 91729-3569

Wells Fargo Dealer Services, Inc.
P.O. Box 1697
Winterville, NC 28590-1697

Wisconsin Bell, Inc.
AT&T Services, Inc.
Karen A. Cavagnaro-Lead Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

Wisconsin Department of Revenue
2135 Rimrock Road
PO Box 8901
Madison, WI 53708-8901

Wisconsin Department of Revenue
819 North 6th Street
Suite 408
Milwaukee, WI 53203-1606

Wisconsin Electric Power Co.
WE Energies
PO Box 2046, Room A130
Milwaukee, WI 53201-2046

Vera M. Green
6603 North 58th Street
Milwaukee, WI 53223-5933

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Americollect
P.O. Box 1566
Manitowoc, WI 54221-1566

City of Milwaukee, Treasurer's Office
200 East Wells Street
Room #103
Milwaukee, WI 53202

Internal Revenue Service
211 W. Wisconsin Avenue
Milwaukee, WI 53203

(d)Internal Revenue Service
Centralized Insolvency Unit
P.O. Box 21126
Philadelphia, PA 19114

(d)Internal Revenue Service
Department of the Treasury
Kansas City, MO 64999-0030